### United States District Court SOUTHERN DISTRICT OF NEW YORK



Osvaldo De La Rosa

Plaintiff,

- against -

cv 10704

(CLL

John E. Potter, Postmaster Defendant. General, U.S.P.S.

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Daniel Abraham

a member in good standing of

the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Edelmiro Antonio Salas-Gonzalez

Firm Name:

**Edelmiro Salas Law Offices** 

Address:

1072 CALLE 17, URB. VILLA NEVAREZ

City/State/Zip:

Phone Number:

7873764659

Fax Number:

7872963487

Edelmiro Antonio Salas-Gonzalez

is a member in good standing of the Bar of the States of

COMMONWEALTH OF PUERTO RICO

There are no pending disciplinary proceeding against Edelmiro Antonio Salas-Gonzalez in any State or Federal court.

Dated:

City, State: New York, NY

Respectfully submirled,

Soonsor's

**SDNY Bar** 

Firm Name:

Daniel Abraham Law Office

Address:

236 Broadway, Suite 209

City/State/Zip:

Brooklyn, NY 11211B

Phone Number:

718-782-3565

Fax Number:

718-782-3566

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SDNY Form Web 10/2006

### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

OSVALDO DE LA ROSA,

Plaintiff.

 $\mathbf{v}$ .

JOHN E. POTTER, Postmaster General of the United States.

Defendant.

07 Civ. 10704 (CLB)(GAY)

AFFIDAVIT OF DANIEL ABRAHAM IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

I Daniel Abraham, state under penalty of perjury, as follows:

- 1. I am sponsoring counsel for plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Edelmiro A. Salas-González as counsel pro hac vice to represent Plaintiff in this matter.
- 2. I am am member in good standing of the bar of the State of New York, and was admitted to practice law in New York in 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York (1993), and am in good standing with this Court.
- 3. I have known Edelmiro Salas González since January of 2005.
- 4. I have found Mr. Salas to be a skilled attorney and a person of integrity. He is experienced in Federal Practice and is familiar with the Federal Rules of Civil Procedure.
- 5. Accordingly, I am pleased to move the admission of Edelmiro A. Salas-González, pro hac vice.
- 6. I respectfully submit proposed order granting the admission of Edelmiro Salas-González, pro hac vice, to represent plaintiff in the above captioned matter.

WHEREFORE it is respectfully requested that the motion to admit Edelmiro A. Salas-González pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

VERIFICATION UNDER 28 U.S.C. §1746: I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted:

aniel Abraham

SDNY Bar Code: DA 6359

## Commonwealth of Puerto Rico Supreme Court San Juan, Puerto Rico

# Certificate

This is to certify that on 3rd day of July, 2001

## Edelmiro Antonio Salas-González

was admitted by this Supreme Court to practice as an attorney at law on all the courts of the Commonwealth of Puerto Rico, after taking and passing the written bar examination and taking and subscribing the oath required by law. I further certify that Mr. Salas-González is in Good Standing on the Roll of Attorneys of this Court.

In Witness Whereof, Issue this certificate, on which I have cancelled an internal revenue stamp of one dollar, in the City of San Juan, Puerto Rico, this 9th day of June, 2008.

Jan Jah

Supreme Court of Puerto Rico

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

OSVALDO DE LA ROSA,

Plaintiff,

v.

JOHN E. POTTER, Postmaster General of the United States,

Defendant,

07 Civ. 10704 (CLB)(GAY)

AFFIRMATION OF SERVICE

OF MOTION TO ADMIT COUNSEL PRO HAC VICE

#### AFFIRMATION OF SERVICE

I, Daniel Abraham, hereby affirm that on June 16, 2008, I served the within Motion, titled

#### MOTION TO ADMIT COUNSEL PRO HAC VICE

upon attorney Li Yu of the U.S. Attorney's Office, SDNY, attorney for the Defendant, Postmaster General John E. Potter, by depositing a true copy thereof in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within the State of New York, addressed to:

Li Yu, Esq., U.S. Attorney's Office, SDNY 86 Chambers Street New York, NY 10007 (212) 637-2734

Fax: (212) 637-2686 Email: li.yu@usdoj.gov

DANIEL ABRAHAM DA 6359

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